



Your business
is our business.

REDACTED – FOR PUBLIC INSPECTION

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Greenbelt, Maryland 20770
phone: 301-459-7590, fax: 301-577-5575
internet: www.jsitel.com, e-mail: jsi@jsitel.com

October 15, 2013

By Hand Delivery

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

**Re: WC Docket No. 10-90, WC Docket No. 11-42
2013 ETC Annual Report of North Penn Telephone Company
Study Area Code 170192**

Dear Ms. Dortch:

On behalf of North Penn Telephone Company “North Penn”, JSI files the attached confidential and redacted versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission’s rules.¹ North Penn seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.² The redacted version is also being filed this date via the FCC’s Electronic Comment Filing System.

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

cc: Charles Tyler, Telecommunications Access Policy Division (two copies, confidential)

¹ 47 C.F.R. §§ 54.313, 54.422.

² *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, Protective Order, DA 12-1857 rel. Nov. 16, 2012 (Protective Order). 47 C.F.R. § 54.313(f)(2).

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010> Study Area Code	170192
<015> Study Area Name	NORTH PENN TEL CO
<020> Program Year	2014
<030> Contact Name: Person USAC should contact with questions about this data	Thomas Prestigiacomo
<035> Contact Telephone Number: Number of the person identified in data line <030>	607-522-3712
<039> Contact Email Address: Email of the person identified in data line <030>	tprestie@etcnpt.com

ANNUAL REPORTING FOR ALL CARRIERS		54.313 Completion Required	54.422 Completion Required
		(check box when complete)	
<100> Service Quality Improvement Reporting	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>
<200> Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210> <input checked="" type="checkbox"/> <-- check box if no outages to report			
<300> Unfulfilled Service Requests (voice)	<input type="text" value="0"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<310> Detail on Attempts (voice)	(attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>
<320> Unfulfilled Service Requests (broadband)	<input type="text" value="0"/>	<input type="checkbox"/>	<input type="checkbox"/>
<330> Detail on Attempts (broadband)	(attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>
<400> Number of Complaints per 1,000 customers (voice)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<410> Fixed	<input type="text" value="0.0"/>		
<420> Mobile	<input type="text"/>		
<430> Number of Complaints per 1,000 customers (broadband)		<input type="checkbox"/>	<input type="checkbox"/>
<440> Fixed	<input type="text"/>		
<450> Mobile	<input type="text"/>		
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510> 170192pa510	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600> Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610> 170192pa610	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700> Company Price Offerings (voice)	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>
<710> Company Price Offerings (broadband)	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>
<800> Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900> Tribal Land Offerings (Y/N)? <input type="radio"/> <input checked="" type="radio"/>	(if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1000> Voice Services Rate Comparability	(check to indicate certification)	<input type="checkbox"/>	<input type="checkbox"/>
<1010>	(attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>
<1100> Terrestrial Backhaul (Y/N)? <input checked="" type="radio"/> <input type="radio"/>	(if not, check to indicate certification)	<input type="checkbox"/>	<input type="checkbox"/>
<1110>	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>	(check to indicate certification)	<input type="checkbox"/>	<input type="checkbox"/>
<2005>	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

<3000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**(100) Service Quality Improvement Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	170192
<015>	Study Area Name	NORTH PENN TEL CO
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Thomas Prestigiacomo
<035>	Contact Telephone Number - Number of person identified in data line <030>	607-522-3712
<039>	Contact Email Address - Email Address of person identified in data line <030>	tprestia@tcnpt.com

<110>	Has your company received its ETC certification from the FCC?	(yes / no)	<input type="radio"/> <input checked="" type="radio"/>
<111>	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?	(yes / no)	<input type="radio"/> <input checked="" type="radio"/>

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

Name of Attached Document (.pdf)

Please check these boxes below to confirm that the attached PDF, on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

<113>	Maps detailing progress towards meeting plan targets	<input type="checkbox"/>
<114>	Report how much universal service (USF) support was received	<input type="checkbox"/>
<115>	How (USF) was used to improve service quality	<input type="checkbox"/>
<116>	How (USF) was used to improve service coverage	<input type="checkbox"/>
<117>	How (USF) was used to improve service capacity	<input type="checkbox"/>
<118>	Provide an explanation of network improvement targets not met in the prior calendar year.	<input type="checkbox"/>

<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>

(710) Broadband Price Offerings Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	170192
<015>	Study Area Name	NORTH PENN TEL CO
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Thomas Prestigiacomo
<035>	Contact Telephone Number - Number of person identified in data line <030>	607-522-3712
<039>	Contact Email Address - Email Address of person identified in data line <030>	tprestie@cncpt.com

[illegible]

<010>	Study Area Code	170192
<015>	Study Area Name	NORTH PENN TEL CO
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Thomas Prestigiacomo
<035>	Contact Telephone Number - Number of person identified in data line <030>	607-522-3712
<039>	Contact Email Address - Email Address of person identified in data line <030>	tpresti@tcnpt.com
<810>	Reporting Carrier	North Penn Telephone Company
<811>	Holding Company	Barch, Inc
<812>	Operating Company	North Penn Telephone Company

10/09/2013

**(900) Tribal Lands Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	170192
<015>	Study Area Name	NORTH PENN TEL CO
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Thomas Prestigiacomo
<035>	Contact Telephone Number - Number of person identified in data line <030>	607-522-3712
<039>	Contact Email Address - Email Address of person identified in data line <030>	tprestia@etcmpt.com

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document (.pdf)

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached PDF, on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions;
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select (Yes, No, NA)

(1100) No Terrestrial Backhaul Reporting Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	170192
<015>	Study Area Name	NORTH PENN TEL CO
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Thomas Prestigiacomo
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<039>	Contact Email Address - Email Address of person identified in data line <030>	tprestia@etcnpt.com

Please check this box to confirm no terrestrial backhaul
 <1120> options exist within the supported area pursuant to § 54.313(G)
 ☐

Please check this box to confirm the reporting carrier offers
 <1130> broadband service of at least 1 Mbps downstream and 256 kbps
 upstream within the supported area pursuant to § 54.313(G)
 ☐

(1200) Terms and Condition for Lifeline Customers
Lifeline
Data Collection Form

FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

<010>	Study Area Code	170192
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<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Thomas Prestigiacomo
<035>	Contact Telephone Number - Number of person identified in data line <030>	607-522-3712
<039>	Contact Email Address - Email Address of person identified in data line <030>	tpresti@etcmpt.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

170192pa1210

Name of attached document (.pdf)

<1220> Link to Public Website

HTTP

"Please check these boxes below to confirm that the attached PDF, on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ☒

<1222> Details on the number of minutes provided as part of the plan, ☒

<1223> Additional charges for toll calls, and rates for each such plan. ☒

(2000) Price Cap Carrier Additional Documentation Data Collection Form <i>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</i>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	170192
<015>	Study Area Name	NORTH PENN TEL CO
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Thomas Prestigiacomo
<035>	Contact Telephone Number - Number of person identified in data line <030>	607-522-3712
<039>	Contact Email Address - Email Address of person identified in data line <030>	tprestie@tcnpt.com

CHECK the boxes below to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting		
<2010>	2nd Year Certification {47 CFR § 54.313(b)(1)}	<input type="checkbox"/>
<2011>	3rd Year Certification {47 CFR § 54.313(b)(2)}	<input type="checkbox"/>
Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}		
<2012>	2013 Frozen Support Certification	<input type="checkbox"/>
<2013>	2014 Frozen Support Certification	<input type="checkbox"/>
<2014>	2015 Frozen Support Certification	<input type="checkbox"/>
<2015>	2016 and future Frozen Support Certification	<input type="checkbox"/>
Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}		
<2016>	Certification Support Used to Build Broadband	<input type="checkbox"/>
Connect America Phase II Reporting {47 CFR § 54.313(e)}		
<2017>	3rd year Broadband Service Certification	<input type="checkbox"/>
<2018>	5th year Broadband Service Certification	<input type="checkbox"/>
<2019>	Interim Progress Certification	<input type="checkbox"/>
<2020>	Please check the box to confirm that the attached PDF, on line 2021, contains the required information pursuant to § 54.313 (e)(3)(i), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.	<input type="checkbox"/>
<2021>	Interim Progress Community Anchor Institutions	<input type="checkbox"/>
		Name of Attached Document Listing Required Information

(3000) Rate Of Return Carrier Additional Documentation		FCC Form 481
Data Collection Form		OMB Control No. 3060-0986/OMB Control No. 3060-0819
		July 2013

<010> Study Area Code	170192
<015> Study Area Name	NORTH PENN TEL CO
<020> Program Year	2014
<030> Contact Name - Person USAC should contact regarding this data	Thomas Prestigiacomo
<035> Contact Telephone Number - Number of person identified in data line <030>	607-522-3712
<039> Contact Email Address - Email Address of person identified in data line <030>	tpreati@tcnpt.com

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

Progress Report on 5 Year Plan

(3010) Milestone Certification (47 CFR § 54.313(f)(1)(i)) Please check this box to confirm that the attached PDF, on line 3012, contains the required information pursuant to § 54.313(f)(1)(i), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.	Name of Attached Document Listing Required Information	<input type="checkbox"/>
(3012) Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))	Name of Attached Document Listing Required Information	<input checked="" type="checkbox"/> (Yes/No)
(3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))		<input type="checkbox"/> (Yes/No)
(3014) If yes, does your company file the RUS annual report Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:		<input type="checkbox"/>
(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)		<input type="checkbox"/>
(3016) PDF of Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Name of Attached Document Listing Required Information	<input checked="" type="checkbox"/> (Yes/No)
(3018) If the response is no on line 3014, is your company audited? If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:		<input checked="" type="checkbox"/>
(3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications		<input checked="" type="checkbox"/>
(3020) PDF of Balance Sheet, Income Statement and Statement of Cash Flows		<input checked="" type="checkbox"/>
(3021) Management letter issued by the independent certified public accountant that performed the company's financial audit. If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:		<input checked="" type="checkbox"/>
(3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers,		<input type="checkbox"/>
(3023) Underlying information subjected to a review by an independent certified public accountant		<input type="checkbox"/>
(3024) Underlying information subjected to an officer certification.		<input type="checkbox"/>
(3025) PDF of Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3026) Attach the worksheet listing required information	Name of Attached Document Listing Required Information	170192pa3026

Certification - Reporting Carrier Data Collection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010> Study Area Code	170192	
<015> Study Area Name	NORTH PENN TEL CO	
<020> Program Year	2014	
<030> Contact Name - Person USAC should contact regarding this data	Thomas Prestigiacomo	
<035> Contact Telephone Number - Number of person identified in data line <030>	607-522-3712	
<039> Contact Email Address - Email Address of person identified in data line <030>	tpresti@etcnpt.com	

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	NORTH PENN TEL CO
Signature of Authorized Officer:	CERTIFIED ONLINE Date 10/09/2013
Printed name of Authorized Officer:	Thomas Prestigiacomo
Title or position of Authorized Officer:	CFO
Telephone number of Authorized Officer:	607-522-3712
Study Area Code of Reporting Carrier:	170192 Filing Due Date for this form: 10/15/2013
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Agent / Carrier Data Collection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010> Study Area Code	170192	
<015> Study Area Name	NORTH PENN TEL CO	
<020> Program Year	2014	
<030> Contact Name - Person USAC should contact regarding this data	Thomas Prestigiacomo	
<035> Contact Telephone Number - Number of person identified in data line <030>	607-522-3712	
<039> Contact Email Address - Email Address of person identified in data line <030>	tpresti@etcnpt.com	

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent: _____	
Name of Reporting Carrier: _____	
Signature of Authorized Officer: _____	Date: _____
Printed name of Authorized Officer: _____	
Title or position of Authorized Officer: _____	
Telephone number of Authorized Officer: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier: _____	
Name of Authorized Agent or Employee of Agent: _____	
Signature of Authorized Agent or Employee of Agent: _____	Date: _____
Printed name of Authorized Agent or Employee of Agent: _____	
Title or position of Authorized Agent or Employee of Agent: _____	
Telephone number of Authorized Agent or Employee of Agent: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

In establishing this certification in its *2005 ETC Order*,¹ the FCC found that an ETC must make “a specific commitment to objective measures to protect consumers.”² The Commission found that for wireless ETCs, compliance with CTIA’s Consumer Code for Wireless Service would satisfy this requirement” and that the sufficiency of other commitments would be considered on a case-by-case basis.³ In this context, the FCC stated, “to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement.”⁴

North Penn Telephone Company (“Company”) hereby certifies that it is complying with applicable service quality standards and consumer protection rules. The Company is subject to service quality standards and consumer protection obligations under state law. These standards and obligations include, but are not limited to, the following: (1) filing a Local Exchange Tariff pursuant to the requirements of the Pennsylvania Public Utility Commission which disclose rates, terms and conditions of service to customers; (2) adherence to state service quality standards and consumer protection requirements governing telephone providers under Pa Code Title 52 Public Utilities, Part I - Public Utility Commission, Subpart C - Fixed Service Utilities, Chapter 63 and 64; (3) truth-in-billing requirements; and (4) CPNI, Red Flag Rules and

¹ *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) (“*2005 ETC Order*”).

² *Id.* at para. 28.

³ *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: “(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy.” *Id.* at n. 71.

⁴ *Id.* at n. 72.

other applicable federal and state requirements governing the protection of customers' privacy.

The Company offers the following as examples of how it meets the service quality and consumer protection requirements. Company maintains and updates appropriate tariffs with all rates, terms and conditions on file with the Pennsylvania Public Utility Commission and maintains a copy of such tariff for public inspection at Company offices. Company also sends all required bill messages and/or customer notifications, including but not limited to, do-not call list, cramming, truth-in billing, Low Income Support/Lifeline, etc. The Company maintains a CPNI Manual and Red Flag Manual. It also prepares and maintains monthly trouble reports.

The North Penn Telephone Company ("Company") hereby certifies that it is able to function in emergency situations as set forth in §54.202(a)(2).¹ The Company's network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow the Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically, each central office building is supplied with standby generators and battery back-up that enable the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic. The Company has battery backup at all office locations and in its electronic equipment sites. Length of run time is determined by the equipment serving the area and the number of customers working out of the equipment. Generators are installed at all Central Office locations. They will continue to run as long as the Company has access to fuel.

Each central office building is equipped with battery back-up. Generators are available for additional back-up until power is restored based on available fuel source. An emergency maintenance program is activated during times of power outage in order to keep phone service operational to Company customers.

¹ Section 54.202(a)(2) requires ETCs that are designated by the Commission to "demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations."

<010>	Study Area Code	170192
<015>	Study Area Name	NORTH PENN TEL CO
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<810>	Reporting Carrier	North Penn Telephone Company
<811>	Holding Company	Barch, Inc
<812>	Operating Company	North Penn Telephone Company

[illegible]

Supplement No. 163 - Telephone – PA P.U.C. No. 2

North Penn Telephone
Company

Section 3
5th Revised Sheet 6
Cancels 4th Revised Sheet 6

LIFELINE SERVICE

B. REGULATIONS (cont'd)

3. An applicant for Lifeline Service must be a current participant in one of the following Pennsylvania programs, or be able to provide proof of household income which is at or below 135% of the annual Federal Poverty Guidelines for all States (except Alaska and Hawaii) and the District of Columbia. Recertification of Lifeline Service participants must be conducted annually by North Penn Telephone Company to ensure continued eligibility. Lifeline customers have the responsibility to notify the Telephone Company within thirty (30) days of a change in eligibility status if they no longer qualify for Lifeline Service.

Pennsylvania Department of Public Welfare Lifeline Service Programs:

- * Temporary Assistance for Needy Families (TANF) (C)
- * * *
- * Supplemental Security Income (SSI)
- * Medicaid
- * Supplemental Nutrition Assistance Program (SNAP) (f/k/a Food Stamps)
- * Low Income Home Energy Assistance Program (LIHEAP)

Additional Eligible Programs (Federal)

- * Federal Public Housing
- * National School Free Lunch Program

The DPW Programs listed above must be certified by DPW. Such certification by DPW will be provided only when a DPW client requests Lifeline Service based on the client's status as a participant in any of the above eligibility programs. Certification by DPW will be limited to confirmation of the client's program status (i.e., participation or non-participation). Participation by DPW is subject to execution of an agreement with DPW and North Penn Telephone Company.

4. Lifeline Service will be provided to a customer only so long as such customer continues to meet the participation and certification guidelines in B-3 above. At the time of initial establishment of Lifeline Service, the customer agrees to have his or her eligibility recertified annually by North Penn Telephone Company. When North Penn Telephone Company is notified by the customer or determines through recertification that the Lifeline Service customer is no longer a participant in the DPW programs in B.3. above or otherwise low-income eligible, the customer will be notified (by telephone or letter) that the Lifeline Service rate is no longer applicable. Within the stated customer notification period (30 days from the date of the notification), the customer can contact the Company to negotiate new Dial Tone Service arrangements at applicable tariff rates (no connection charges will apply for existing services or options retained). If the customer does not contact the Company by the end of the notification period, the Lifeline Service will be changed to applicable Exchange Area Dial Tone Line service at existing tariff rates (no connection charges will apply to existing services or options retained).

(C) Indicates Change

Issued: November 16, 2012

Effective: November 17, 2012

North Penn Telephone Company

Attachment - Line 1210

Supplement No. 165 - Telephone - PA P.U.C. No. 2

North Penn Telephone
Company

Section 2
Twentieth Revised Sheet 1
Cancels Nineteenth Revised Sheet 1

LOCAL EXCHANGE SERVICE

Local Exchange Service includes the Central Office equipment with rotary dialing capability, outside plant distribution wire and cable, drop wire and station protector.

The rates listed below do not include any terminal equipment - telephone, ringers, couplers, or inside station wiring.

Local Exchange Service with push button dialing capability is available at the Bentley Creek, Millerton, and Roseville exchanges at the rates listed below: PLUS, \$1.25 per month for business and residence.

MONTHLY RATES

<u>Service</u>	<u>MILLERTON</u>	<u>BENTLEY CREEK</u>	<u>ROSEVILLE</u>
PBX	\$23.25	\$24.42	\$28.59
One Party Business	14.97	15.73	18.45
One Party Residence	14.84 (I)	15.27 (I)	16.81 (I)

(I) Indicates Increase

Issued: February 20, 2013

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North Penn Telephone Company

Attachment - Line 1210

Supplement No. 165 -Telephone – PA P.U.C. No. 2

North Penn Telephone
Company

SECTION 6
Eighth Revised Sheet 7
Cancels Seventh Revised Sheet 7

MISCELLANEOUS SERVICE AND EQUIPMENT (cont'd)

1. Description

Product bundles provide residential customers the option of subscribing to service packages that combine basic local service with other features and services offered by or through the Company at a single bundled rate. Product bundles are available on a monthly subscription basis at the rates provided below. Rates are in addition to any applicable taxes, surcharges, fees and non-recurring charges.

<u>Product</u>	<u>Rate</u>	
Unlimited Talk Bundle:	\$40.95	(I)
Primary Line***		
Deluxe Caller ID with Call Waiting***		
Three Way Calling***		
Call Forwarding***		
Touch Tone***		
Unlimited Long Distance Usage*		
Unlimited Talk Bundle with High Speed Internet:	\$74.95	(I)
Primary Line***		
Deluxe Caller ID with Call Waiting***		
Three Way Calling***		
Call Forwarding***		
Touch Tone***		
Unlimited Long Distance Usage*		
DSL up to 1.5 Mbps**		

*Provided for informational purposes only (non-jurisdictional in this tariff); long distance must be provided by North Penn Telephone Company/North Penn Long Distance to benefit from the long distance minutes of use component. Restrictions on use of unlimited long distance service are shown in 2.e Regulations.

** Provided for informational purposes only (non-jurisdictional in this tariff); DSL is provided by North Penn Telephone Company/North Penn Access and DSL speeds are not guaranteed. North Penn Telephone Company/North Penn Video provides the Digital TV service.

*** The regulated portions of this package can be found in Sections 2 and 6 of this Tariff.

(I) Indicates Increase

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North Penn Telephone Company

Attachment - Line 1210

Supplement No. 166 -Telephone – PA P.U.C. No. 2

North Penn Telephone
Company

SECTION 6
Seventh Revised Sheet 8
Cancels Sixth Revised Sheet 8

MISCELLANEOUS SERVICE AND EQUIPMENT (cont'd)

1. Description (continued)

Unlimited Talk Bundle with High Speed Internet and Digital TV:	\$121.95	(I)
Primary Line***		
Deluxe Caller ID with Call Waiting***		
Three Way Calling***		
Call Forwarding***		
Touch Tone***		
Unlimited Long Distance Usage*		
DSL up to 1.5 Mbps**		
Digital TV Service**		
Unlimited Talk Bundle with Digital TV:	\$93.95	(I)
Primary Line***		
Deluxe Caller ID with Call Waiting***		
Three Way Calling***		
Call Forwarding***		
Touch Tone***		
Unlimited Long Distance Usage*		
Digital TV Service**		

2. Regulations

- a. Bundled Packages are only available to customers whose long distance is provided by North Penn Telephone Company/North Penn Long Distance, and whose DSL/Digital TV service is provided by North Penn Telephone Company/North Penn Access/North Penn Video.
- b. Bundled Packages are only available to residential customers.
- c. Bundled Package customers may terminate the package or switch to another calling plan at any time.
- d. Customers enrolled in Bundled Packages who fail to pay the entire package rate due per month will have all existing Bundled Package services converted to the applicable tariff rates for the individual services included in their package. Customers will not be permitted to re-enroll in the Bundled Packages until such time as all associated unpaid balances have been paid in full.
- e. The Unlimited long distance plan provides residential subscribers with unlimited minutes of direct dialed (1+) domestic long distance calling within the United States. All other usage will be billed at the applicable tariffed rates. If it is determined that usage is not consistent with residential voice application, such as for Internet Access Service, commercial facsimile or auto-residential uses, the Company may immediately convert the customer's long distance to a non-unlimited plan.
- f. Call detail is not included on the customer paper statement with this plan.

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** Provided for informational purposes only (non-jurisdictional in this tariff); DSL is provided by North Penn Telephone Company/North Penn Access and DSL speeds are not guaranteed. North Penn Telephone Company/North Penn Video provides the Digital TV service.

*** The regulated portions of this package can be found in Sections 2 and 6 of this Tariff.

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REDACTED – FOR PUBLIC INSPECTION

NORTH PENN TELEPHONE COMPANY (SAC 170192)

ATTACHMENT - LINE 3017

ATTACHMENT REDACTED IN ENTIRETY